



August 15, 2019

Regional Freedom of Information Officer  
U.S. EPA, Region 1 (OARM01-6)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
(617) 918-1102

**Re: Freedom of Information Act Request**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552 and 42 U.S.C. Section 9604(e)(7)(A),<sup>1</sup> I am requesting copies and/or access to records held at EPA's Region 1 office.

Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), Clean Air Act (CAA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning a site in the village of Wood River Junction in Richmond, Rhode Island, sometimes with an address shown at 477 Church Street.

At various times the company at this site has used names including, but not limited to, the following:

- Warwick Chemical Company
- Sun Chemical Corporation, Warwick Chemical Division
- Sequa Corporation
- Wood River Chemical
- Agency Realty & Mortgage Company or ARMCO
- Carroll Products

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<sup>1</sup> The relevant statutory text provides that: "Any records, reports, or information obtained from any person under this section (including records, reports, or information obtained by representatives of the President) shall be available to the public, [except for trade secrecy claims]. Trade secrecy claims are restricted by section 104(e)(7)(F).

Below, I have included information on site occupant names (including some not listed above), address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

#### RCRA Requested Documents

We understand that hazardous waste generated by Wood River Chemical Inc. on Route 91, Richmond, RI was regulated under the Resource Conservation and Recovery Act (RCRA) and was assigned the following RCRA facility ID: RID000446997. At this same address, we understand that waste generated by Agency Realty & Mortgage Company Inc., was assigned RCRA facility ID: RID002042216. Later in time, we understand that shipments from this facility under the name or names of Sequa Corp., Carroll Products, and/or ARMCO were assigned RCRA ID number RID000014246.

We request the following materials relating to this facility produced by the company as required by RCRA:

- RCRA Notification
- Part A application (Form 8700-12)
- Inspections and correspondence for the period 1984 and earlier
- Any RCRA Part B Application
- Work plans and closure documentation related to contamination processes and chemical releases
- Biennial hazardous waste reports from 1981 to 1985
- Any correspondence involving the decision by EPA or the State of Rhode Island to proceed with the cleanup of this site under RCRA rather than Superfund (Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)).

#### AIR Requested Documents

We understand that Agency Realty and Mortgage Company Inc. at 477 Church Street (Route 91), Richmond, RI, operated under the regulation of the Clean Air Act with the following facility ID: RI0000004400900003.

We therefore request the following documents related to this facility:

- Air permit registration and application documents
- Inspection files
- Correspondence for 1994 and earlier

#### TSCA Inventory Requested Documents

We understand that, under the chemical inventory provisions of the Toxic Substances Control Act (TSCA), Sequa Corp/Carroll Products at 477 Church Street (Route 91), Richmond, RI identified certain chemicals used at these sites. We therefore request the following documents related to this facility produced as required by TSCA:

- 1979 and earlier Trademark and Product Name submittals
- 1986 Reporting Year Data

#### TSCA PCB Regulations

We understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated at the Sequa Corp/Carroll Products facility at 477 Church Street (Route 91), Richmond, RI. We therefore request the following documents related to PCBs and the installation, which was assigned the following TSCA ID: RIP000014246:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving these locations or parties, including documentation regarding a 1996 waste manifest for 21,778 kgs and 8 drums of miscellaneous PCB wastes (B007).

#### Superfund Enterprise Management System

We understand that, under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Carroll Products at Route 91, Richmond, RI was identified as a possible Superfund site and was assigned the following facility ID: RID002042216. We therefore request the following documents related to this facility produced as required under CERCLA:

- Discovery, preliminary site assessment, and site investigation
- All correspondence concerning the decision to defer cleanup of this site to RCRA authorities under RCRA Subtitle C.
- Work plans and closure documentation focusing on processes causing contamination and chemical releases.

#### Request Information

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at [HBerg@historyassociates.com](mailto:HBerg@historyassociates.com).

Sincerely,

Hilary Bergen